

Jonathan Arthur

From: Jonathan Arthur <j.arthur@robertslaw.org>
Sent: Tuesday, October 26, 2021 4:43 PM
To: 'Anne Lahren'; 'Coreen Silverman'
Subject: RE: Caron Nazario v. Joe Gutierrez, et al. (2:21cv169) Settlement Conference

Counselors:

While appreciate all of your assurances that our agreed protective orders and discovery supplements will be forthcoming. I will file my motions to compel and my motions for protective order tomorrow, we are no longer willing to wait.

-Jonathan

Plaintiff's Counsel informing Counsel for Defendants 35 days after transmitting the proposed order (Ex. 4), and 19 days after Defense Counsel agreed to make the amendments they wanted (Ex. 6, p.1) that he could no longer wait for their revisions to the protective order and would file without their changes. (See. Docs 49-50).

From: Anne Lahren <alahren@PenderCoward.com>
Sent: Tuesday, October 26, 2021 4:02 PM
To: 'Jonathan Arthur' <j.arthur@robertslaw.org>
Subject: FW: Caron Nazario v. Joe Gutierrez, et al. (2:21cv169) Settlement Conference

Jonathan:

FYI – I'll have Crocker's revised discovery responses to you by 5pm. Just got out of all day judicial interviews and copying Crocker's responses into the main discovery response document. I hope you had a very enjoyable long weekend.

Annie

Anne C. Lahren
ATTORNEY

PENDER & COWARD
ATTORNEYS AND COUNSELLORS AT LAW

(757) 490-6293 | fax (757) 502-7370

alahren@pendercoward.com

From: Jonathan Arthur <j.arthur@robertslaw.org>
Sent: Tuesday, October 26, 2021 3:55 PM
To: 'Deborah Crowder' <Deborah.Crowder@vaed.uscourts.gov>; andrew.bodoh@robertslaw.org; thr@robertslaw.org; 'John Mumford' <jmumford@hancockdaniel.com>; 'Coreen Silverman' <csilverman@hancockdaniel.com>; Anne Lahren <alahren@PenderCoward.com>; RICHARD H. MATTHEWS <RMATTHEW@PenderCoward.com>; Robert Samuel <rsamuel@PenderCoward.com>; Bryan S. Peebles <bpeeples@PenderCoward.com>
Subject: RE: Caron Nazario v. Joe Gutierrez, et al. (2:21cv169) Settlement Conference

External Email

Ms. Crowder:

That will work on our end.